

Michael Rosenthal, (WSB #5-2099)
HATHAWAY & KUNZ, LLP
P.O. Box 1208
Cheyenne, WY 82003-1208
(307) 634-7723
Fax: (307) 634-0985
mike@hkwyolaw.com

Nathan Nicholas, (WSB 7-5078)
KOCH LAW, PC
121 W. Carlson St., Ste 5
Cheyenne, WY 82009
(307) 631-6383
nnicholas@kochlawpc.com

Frank L. Watson, III (TN Bar #015073)
Craig Edgington (TN Bar #038205)
William E. Routt, III (TN Bar #028577)
William F. Burns (TN Bar#017908)
WATSON BURNS, PLLC
5865 Ridgeway Center Pkwy., Ste. 300
Memphis, TN 38120
(901) 529-7996
Fax: (901) 529-7998
fwatson@watsonburns.com
cedgington@watsonburns.com
wroutt@watsonburns.com
bburns@watsonburns.com

ATTORNEYS FOR PLAINTIFFS

Thomas Quinn (WY: 5-2630)
Lillian L. Alves (*Pro Hac Vice*)
Lindsey M. Romano (*Pro Hac Vice*)
GORDON REES SCULLY MANSUKHANI, LLP
555 Seventeenth St. Suite 3400
Denver, CO 80202
tquinn@grsm.com
lalves@grsm.com
lromano@grsm.com

ATTORNEYS FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

CARLIE SHERMAN, and AMANDA NASH;
on Behalf of themselves and all similarly
situated persons,

CASE NO. 20-cv-215-SWS

PLAINTIFFS,

v.

TRINITY TEEN SOLUTIONS, INC.,
a Wyoming corporation; **ANGELA C.**
WOODWARD, JERRY D. WOODWARD,
KARA WOODWARD, KYLE WOODWARD,
And **DALLY-UP, LLC**, a Wyoming limited liability
Corporation,

DEFENDANTS.

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT,
APPROVAL OF THE PROPOSED NOTICE OF SETTLEMENT, AND CLASS ACTION
SETTLEMENT PROCEDURES (“PRELIMINARY APPROVAL MOTION”)**

Plaintiff Amanda Nash, on behalf of herself and the Class (“Plaintiffs”), by and through appointed Class Counsel, and Defendants Trinity Teen Solutions, Inc., Angela C. Woodward, Jerry D. Woodward, Kara Woodward, and Dally-Up, LLC (collectively “Defendants”), by and through their respective attorneys, respectfully move for preliminary approval of the settlement of this class action as provided herein.

Through this Motion, the Parties seek preliminary approval of the terms of the Settlement Agreement entered into at the conclusion of mediation on February 27, 2025. For the reasons set forth below, the proposed Settlement is fair, reasonable, adequate and in the best interests of the Class, and it warrants this Court’s preliminary approval. The Parties seek the Court’s preliminary approval of the Settlement under Federal Rule of Civil Procedure (“Rule”) 23(e)(1) so that notice of the Settlement can be disseminated to the Class and the Final Approval Hearing scheduled. At

the Final Approval Hearing, the Court will have before it additional submissions in support of the Settlement, as well as any objections that may be filed and will be asked to determine whether in accordance with Rule 23(e)(2), the Settlement is fair, reasonable, and adequate.

The Class is defined as any persons

[f]rom November 27, 2010, to present . . . who received treatment from Defendant Trinity Teen Solutions, Inc., and were subject to the provision of “agricultural labor” as defined [in] 26 CFR § 31.3121(g)(1)) or any manual labor to one or more of the Defendants without payment for said labor

(ECF 286, p. 30), and is comprised of 262 women. (ECF 304-4). The Defendants will collectively pay a Gross Settlement Amount of \$2,300,000. Class Members who submit approved claims shall be entitled to a pro-rated daily award from the Net Settlement Amount.

For the reasons set forth herein and in the Memorandum filed in support of this Motion, the Settlement is reasonable and in the best interests of the Class. The Parties respectfully request that the Court enter a Preliminary Approval Order. More specifically, the Parties request that the Court do the following:

- (1) Preliminarily approve the Settlement as fair, reasonable, adequate and in the best interests of the Class;
- (2) Preliminarily approve Incentive Awards of \$15,000 each for Amanda Nash, Carlie Sherman, and Anna Gozun;
- (3) Approve of the issuance of Class Notice to Class Members via publication on the previously established website (*See* ECF No. 302, p. 2) and direct mail.
- (4) Determine that such Class Notice complies with all requirements, including Rule 23 of the Federal Rules of Civil Procedure and the Due Process Clause of the United States Constitution;
- (5) Approve and designate CMM Settlement Solutions as the Administrator and order that it disseminate, in accordance with the terms of the Settlement and Preliminary Approval Order, the Class Notice;
- (6) Require Class Members who wish to object to the Settlement to submit a timely written objection by a deadline and advise that failure to do so shall prevent those Class Members from objecting to the Settlement;

- (7) Require any Class Member who objects to the Settlement and wishes to appear at the Final Approval Hearing to file a notice of intent to appear and to appear in person or by counsel, at the Final Approval Hearing;
- (8) Require any Class Member who seeks to appeal any ruling of the District Court with respect to their objection to file a bond in the amount of \$92,000 (4% of the gross settlement Amount) in order to protect this Settlement;
- (9) Authorize the Parties to take all necessary and appropriate steps to implement the Settlement; and
- (10) Schedule a Final Approval Hearing in person.

Respectfully submitted,

/s/Frank L. Watson

Frank L. Watson, III (TN Bar #015073)
William E. Routt, III (TN Bar #28577)
William F. Burns (TN Bar #017908)
Craig Edgington (TN Bar #038205)
Watson Burns, PLLC
5685 Ridgeway Center Pkwy., Ste. 300
Memphis, TN 38120
Phone: (901) 529-7996
Fax: (901) 877-4629
fwatson@watsonburns.com
cedgington@watsonburns.com
wroutt@watsonburns.com
bburns@watsonburns.com

Michael Rosenthal, WSB #5-2099
Hathaway & Kunz, LLP
P.O. Box 1208
Cheyenne, WY 82003-1208
(307) 634-7723
Fax: (307) 634-0985
mike@hkwyolaw.com

Nathan Nicholas, WSB #7-5078
Koch Law, PC
121 W. Carlson St. #3
Cheyenne, Wyoming 82009
(307) 631-6383
nnicholas@kochlawpc.com

ATTORNEYS FOR CLASS MEMBERS

/s/ Thomas B. Quinn
Thomas Quinn (WY: #5-2630)
Lillian L. Alves (Pro Hac Vice)
Lindsey M. Romano (Pro Hac Vice)
GORDON REES SCULLY
MANSUKHANI, LLP
555 Seventeenth Street, Suite 3400
Denver, CO 80202
Telephone: (303) 534-5160
tquinn@grsm.com
lalves@grsm.com
lromano@grsm.com

Attorneys for Defendants, Trinity Teen Solutions, Inc., Angela Woodward, Jerry Woodward, Kyle Woodward, Kara Woodward, and Dally-Up, LLC

CERTIFICATE OF SERVICE

This is to certify that on the 28th day of May 2025, a true and correct copy of the foregoing was served upon counsel as follows:

Thomas Quinn [x] CM/ECF
Lillian L. Alves [] U.S. Mail
GORDON REES SCULLY MANSUKHANI, LLP [] Fax: (303) 534-5161
555 Seventeenth Street, Suite 3400 [x] E-mail: tquinn@grsm.com
Denver, CO 80202 lalves@grsm.com

Lindsey M. Romano [x] CM/ECF
Gordon Rees Scully Mansukhani, LLP [] U.S. Mail
315 Pacific Avenue [] Fax:
San Francisco, CA 94111 [x] E-mail: lromano@grsm.com
Phone: 415-986-5900
lromano@grsm.com

/s/ Frank L. Watson